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ATTORNEY FOR PLAINTIFFS

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF OREGON
 EUGENE DIVISION

TYLER BURNARD,
 MICHAEL BRITZIUS,
 DOUGLAS STYLES,

Plaintiffs,

v.

OREGON STATE HOSPITAL,
 ADAM GIBLIN, Personally,
 DELORES MATTEUCCI, Personally,
 PATRICK ALLEN, Personally,

Defendants.

Case No.: 6:22-cv-1982MC
DECLARATION IN SUPPORT
OF PLAINTIFFS' MOTION FOR
EXTENSION OF DISCOVERY

Leonard Berman hereby deposes and declares under penalty of perjury:

1. I am counsel for plaintiffs.
2. . Plaintiffs have deposed Giblin, Matteucci and Sarah Walker, MD. On May 15, defendants deposed all plaintiffs.

At deposition, Mr. Britzius revealed that while no plaintiffs or patients can still order from Amazon and other vendors due to patient/staff "safety issues," Amazon routinely delivers to units numerous shipments for hospital staff and patient use. Plaintiffs are trying to explore this curious double-standard and at deposition and later on May 21,

propounded informal records and deponent identity requests as to requisition forms and related staff-person identity.

3. Discovery closes June 10, 2025.

4. While some defendants at times treat follow-up informal discovery requests casually and in a matter of days or weeks versus the full 30-days, the State insists on having the full time. Even if requested on May 15, the June 10 deadline would have cut off the viable time-frame for response.

5. Plaintiffs anticipate disclosing new evidence, deponents and expect the State to continue with their 30-day rule. Had the state propounded the documents and scheduled the deponents in a few weeks, we might have been able to meet the deadline of June 10. Since the State insists on the time-delay and plaintiffs anticipate needing more follow-up documents and depositions after the current discovery response, a 120-day extension is warranted, to build in time to get related documents and schedule appropriate deponents.

6. In the interest of justice, a 120-day extension for discovery is warranted.

7. Defendants object because the Court indicated no further extensions.

DATED this 1st day of June, 2025.

Respectfully submitted by:

S//S Leonard R. Berman

Leonard R. Berman,

Attorney at Law